

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Susan D. Wigenton
	:	Crim. No. 15-193 (SDW)
v.	:	
	:	
WILLIAM E. BARONI, JR. and	:	
BRIDGET ANNE KELLY	:	
	:	

**DECLARATION OF AUSA DAVID W. FEDER IN SUPPORT OF
THE UNITED STATES OF AMERICA’S MOTION TO SEAL**

I, David W. Feder, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct:

1. I am an Assistant United States Attorney in the United States Attorney’s Office for the District of New Jersey and represent the United States in this matter. I am fully familiar with the facts stated herein. I respectfully submit this declaration in support of the United States’ motion to seal the Government’s November 3, 2016 Letter to the Court (the “Filing”).

2. Because the Filing refers to a matter that was addressed in a sealed courtroom on November 2, 2016, and because its disclosure would complicate the Court’s efforts to ensure a fair trial, the Government submits that, in an abundance of caution, the Filing should be maintained under seal.

3. To provide the Court with a full record of the Government’s position regarding this matter, it is necessary to submit the Filing under seal.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 3rd day of November, 2016, in Newark, New Jersey.

A handwritten signature in black ink, appearing to read 'D. Feder', positioned above a horizontal line.

David W. Feder
Assistant U.S. Attorney